

To: Massachusetts Department of Energy Resources
Re: Manomet Study Public Comments

To Governor Patrick and members of the Department of Energy Resources,

I commend you for taking a step back from the national rush to burn any handy fuels as the panacea for our energy problems. Conventional wisdom is often hard to buck, and it was a wise move to perform an in-depth study of the issue.

My conclusions regarding the study are as follow:

1. Biomass incineration does not deserve renewable energy credits or state incentives for construction, operation or sale of electricity. These financial benefits need to be focused on unequivocally clean and renewable sources, and the underappreciated but highly effective implementation of conservation and insulation measures.
2. Biomass incineration not only increases short and long-term carbon dioxide, but also adds large quantities of particulate matter and ozone precursors to the region's already poor air quality. Western MA in particular already suffers from the poorest of air, and new plants will necessarily reduce air quality even further.
3. CHP plants, while looking more attractive, need further review to determine the full range and quantity of fuels to be burned and their CO₂ impact. In addition, while a few CHP plants may be acceptable, there is no mechanism to control total installations in a region, leading to a potential for greatly reduced air quality and increased health impacts.
4. The notion that removal of logging residue is an appropriate source of biomass fuel ignores the value of such residue in soil health and the process by which carbon content is reincorporated into growth of various organisms. Any argument that wood decomposes into methane in any quantity is rendered absurd when viewing intact, twenty year old logs pulled from landfills, or twenty year old logs on the forest floor, less intact, for sure, yet supporting new saplings, fungi, insects and mosses.

Thank you for your consideration of my comments and for undertaking this process.

Stuart & Lee Ann Warner
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